

**AFFIDAVIT**  
(SWORN STATEMENT)

Date: 6-7-2022, 2022

My legal name is Kayla Miller ("Affiant") and acknowledge I am:

- Age: 27
- Address: 75 Short Street, Blairsville PA 15717
- Residency: \_\_\_\_\_

Being duly sworn, hereby swear under oath that:

See attached Statement

Under penalty of perjury, I hereby declare and affirm that the above-mentioned statement is, to the best of my knowledge, true and correct.

Affiant's Signature: Ka E M Date: 6-7-2022

**NOTARY ACKNOWLEDGEMENT**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of Pennsylvania  
County of Allegheny

On June 7, 2022 before me, Kayla Miller, personally appeared \_\_\_\_\_ who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of Pennsylvania that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature Cristin Gorajczyk (Seal)

Commonwealth of Pennsylvania - Notary Seal  
Cristin Gorajczyk, Notary Public  
Westmoreland County  
My commission expires April 15, 2026  
Commission number 1417790  
Member, Pennsylvania Association of Notaries



Commonwealth of Pennsylvania  
County of Allegheny

Notarized by: [Signature]  
Notary Public  
Westmoreland County  
My Commission Expires April 15, 2025  
Commission Number 141129  
Member, Pennsylvania Association of Notaries

Commonwealth of Pennsylvania  
County of \_\_\_\_\_

When I begin to talk about the Pittsburgh Renaissance Festival and its problems with covering up the grooming, sexual harassment, and sexual assault of underage and young women, I have to start in 2012. In 2012, I had started working at the Pittsburgh Renaissance Festival for a vendor at the age of 17. The majority of the girls who worked for this same vendor were also underage and that was something that seemed to be pretty well known throughout Pittsburgh Renaissance Festival.

While I was the age of 17, an individual on Pittsburgh Renaissance Festival's cast, Eric Barvinchak, took an interest in me. At the time of this, he was 25, 8 years older than me. Eric spent much of his time during the 2012 Pittsburgh Renaissance Festival grooming me through positive reinforcement, relationship-forming, gift-giving and other methods into what would become an illegal sexual relationship under Pennsylvania State Law.

James Amor, the director of the Pittsburgh Renaissance Festival cast, was aware that this grooming situation was happening by Eric Barvinchak. During the 2012 season, James Amor approached me multiple times while working at the Pittsburgh Renaissance Festival to "check up" on Eric. He would ask me questions such as if Eric had been by to see me that day or when was the last time he had come to visit me at my work station. He would ask me about the gifts that Eric had given me as well. The fact that this grooming and type of relationship was illegal did not appear to have any effect on Eric Barvinchak's position at Pittsburgh Renaissance Faire as time moved forward. This relationship and grooming was also not reported as any type of suspected child abuse to my knowledge, despite James Amor being a mandated reporter due to his job outside of Pittsburgh Renaissance Festival as a licensed dentist in the state of Pennsylvania and mandated reporter law in Pennsylvania stating that a mandated reported must report any suspicious of child abuse at any regularly scheduled program, activity, or service.

I continued to work for this same vendor for the next few years at Pittsburgh Renaissance Festival as a summer job to help myself through college. I made friends who worked there along the way as well. In April of 2015, I chose to audition for Pittsburgh Renaissance Festival cast. I was "hired". I use hired very loosely because cast individuals do not become hired until the first day of the festival season when they sign contracts and agree to follow the Code of Conduct given to us. Contracts which I would learn many years later, are in violation of Pennsylvania Labor Law. Before that point, cast members work unpaid by attending mandatory for employment rehearsals during the weekends leading up to the festival. It was at one of these rehearsals in 2015 where James Amor sexually harassed me himself.

During one of our unpaid rehearsals, James Amor's son, Jimmy Amor, was giving a presentation. The group of cast members had gathered around him in a circle in order to best observe this presentation. It was during this presentation that I realized I had a bit far stepped forward out of the circle and was standing in front of James Amor. After realizing this, I apologized for blocking his view of the presentation and stepped out of his way. James Amor then stated to me, "That's okay. I would rather stare at your ass than at Jimmy anyway."

In the moment, I was taken aback by this statement as it was unwanted and unprovoked. I spoke about this to another girl on cast I was friends with Stephanie Kulikowski. Stephanie told me, "Oh that's just Doc (James Amor's nickname). He says things like that to all the young girls on cast. You just have to learn to ignore him." I felt really uncomfortable with her answer, especially knowing that myself and other young women, some of whom were underage, shared a dressing room with this man. I decided to try to take Stephanie's advice and "let it go". After all, apparently this was normal. Even if it definitely didn't feel normal.



Another friend I made that year on the Pittsburgh Cast was Rachel Hull. Rachel was another one of the individuals who had told me that "This is normal" when I discussed the comments James Amor had made to me. I would only learn later that for Rachel this type of harassment was all too normal and had been going on for years. Rachel told me about how her character "Sally Brown" was chosen for her by James Amor specifically to mock her. Sally Brown in many Renaissance era songs, is often referenced to as a sex worker. Rachel had also engaged in legal sex work. Rachel shared that James Amor discovered that she had engaged in this and also told me about how other members of cast had found out, as cast members were sharing pornographic pictures and videos of her back and forth. Rachel also told me about how another cast member Gene Quinn Harlin, had spent time sexually harassing her. Rachel shared that Harlin was one of the individuals involved in sharing pictures of her. She also shared that he was the one who had told multiple sexually explicit jokes about her to other members of cast. Rachel informed me that she had confided in two other cast members, Shawn Howland and Nate Forbes, about what had happened to her. Both Rachel and Shawn Howland allowed me to review the text messages they had sent each other about Rachel's experiences.

At this time, I became wary of the individuals on Pittsburgh Renaissance Festival Cast, in particular James Amor and Gene Quinn Harlin, due to how they had treated me or other women on cast at that time. So throughout the season of 2015, I tried my best to be polite and avoid them when able due to the experiences of harassment from myself and others.

In 2016, the harassment became worse for myself. During an unpaid rehearsal, there was a music rehearsal as cast members do engage in singing songs at times during the day. The rehearsal was lead by Gene Quinn Harlin. During this part of the rehearsal, I began to ask him questions about the piece we were singing as I, at this time, had fifteen years of musical training.

I wanted to discuss the arrangement of the piece as it didn't seem fitting for what we were trying to use it for. I was told by Gene Quinn Harlin, "That's the way I want it to be so don't ask questions" in a tone that was very harsh, rude, and unprofessional.

At a later rehearsal, I was helping other musicians follow tempo by arm conducting for a piece that Gene Quinn Harlin was trying to rehearse. As the tempo had changed drastically from the pieces original tempo it was hard for the musicians to follow along with just reading sheet music. When I was asked by Gene Quinn Harlin what I was doing I replied that it was hard for the other musicians to follow him when he was simply playing guitar. Later in that rehearsal, Eric Barvinchak who was still on cast approached me and informed me that I needed to "stop being involved in the music aspect of cast". Eric told me "That's Quinn's(meaning Gene Quinn Harlin) job not yours." Eric also warned me, "If you keep getting in Quinn's way, what happened to Rachel will happen to you too."

I knew what had happened to Rachel. I knew that Rachel had spent what at this point would have been years on cast being sexually harassed. I knew that the sexual harassment meant Gene Quinn Harlin making sexually explicit jokes about you to other cast members and James Amor assigning you a character to act and represent that was inherently sexually degrading. After that conversation, I chose to stay further away from Gene Quinn Harlin and James Amor and to not speak with them unless spoken to by them.

At a third rehearsal, there was another singing rehearsal. I chose to stand off to the side, so as I could avoid the two men, Gene Quinn Harlin and James Amor, who had threatened to sexually harass me or who already had sexually harassed me. I was called to be closer to them by Patti Amor, James Amor's wife. It was at this time that Patti Amor and another woman on cast Lois began to make harassing remarks to me about why I was "being dramatic" and "acting like I

was in high school". I then spoke out loudly and said, "It is not being dramatic to try to defend myself or other women on this cast and how they are treated. It is not 'high school' to think that how women on this cast are treated is wrong." It was after this that I was able to drive home, as I had officially quit Pittsburgh Renaissance Festival Cast by this outburst.

Later that day I met with Lori Hughes, who was the closest thing to Human Resources the Pittsburgh Renaissance Festival had at that time. Lori and I were able to talk about my experiences. Lori and I discussed my ability to return to Pittsburgh Renaissance Festival and work for a vendor instead of for cast. Lori agreed after reviewing my contract with me, that I was able to return to work as a vendor for the 2016 season because I had not signed a 2016 contract. She also informed me that she would take this information to James Paradise and James Paradise Junior, the two individuals who own and operate Pittsburgh Renaissance Festival.

When the 2016 season came, I was hired by a vendor and was able to work. Until James and Patti Amor had me removed from the Pittsburgh Renaissance Festival due to violation of contract. I was informed this by the vendor I was working for. I knew this wasn't correct information as I had been told by Lori Hughes that I was able to work for this vendor so I called the office of the Pittsburgh Renaissance Festival to review my file. I was then told from the office that I was actually removed because I was "mean" to Patti Amor. This was in specific reference to the time I stood up for myself while experiencing sexual harassment. Due to this, I experienced a loss of wages from the 2016 season and every season moving forward as I was not allowed to work on the Pittsburgh Renaissance Festival site.

Years later, on September 3<sup>rd</sup> of 2019, I chose to visit Pittsburgh Renaissance Festival as a paying customer, as I did still have friends who worked there. During that entire day I was stalked by James Amor while I was on the festival site. I could not turn around without him



being less than ten feet away from me watching me. He followed me across the entire site. He stood outside of booths that I was shopping in. He watched me purchase food from food vendors. I could not escape him. Despite wanting to attempt to enjoy a day with my friends, I spent that day being stalked by the same individual who had sexually harassed me years prior.

On November 7<sup>th</sup> of 2021, I was made aware of a blog post by an individual I used to work Pittsburgh Renaissance Festival with that mentioned both the festival and a girl named Kayla. The blog post specifically talked about experiences of sexual harassment and assault that had taken place at Pittsburgh Renaissance Festival that had been covered up by James Amor. I went to read the blog post to investigate if this was something that was truly about me. Some of the facts were wrong, but I expected them to be. After all, it had been 6 years since the original incident. There were some things bound to get lost.

Some differences between my real experience included; I wasn't dating Shawn Howland at the time, but we were friends as I was with many other cast members. I never accused Gene Quinn Harlin of sexual assault. I did accuse Gene Quinn Harlin and James Amor with harassment and sexual harassment. I had heard stories of what had happened to another individual on cast (Rachel Hull) who had experienced harassment and had chosen to distance myself from both of them for my safety. I did stand up for myself to Patti Amor when I was experiencing harassment and being asked to work with my harassers, though not in quite the way the blog describes. But, for being six years removed from the scenario, and told from how many people who aren't myself, the blog holds mostly accurate.

The biggest thing is that I would like this to be over. I know there are girls who came after me who had these same grooming, harassment, and assault experiences. I would like for them to experience justice because at this point, it's too late for me. In an ideal world, I'd like



what is at this point almost seven years of lost wages back, because I would have never stopped working at the Pittsburgh Renaissance Festival if I wasn't sexually harassed. In an ideal world, James Amor and Gene Quinn Harlin would stop talking about me and my experiences to other individuals. Other individuals who can also cause me to lose wages as I work on the renaissance festival circuit throughout the country. But I recognize that an ideal world isn't one that I'm blessed enough to live in. I can however share the truth of my story which is that Gene Quinn Harlin and James Amor threatened me and sexually harassed me at Pittsburgh Renaissance Festival and then covered it up for years afterwards, in hopes they could get away with it.



**CODE OF CONDUCT :** Between Doc Amor, Patti Amor and the Cast

**SMILE** Our main product is entertainment; therefore, smile and you will produce smiles. The patron is always treated as if they are correct.

**RESPECT** Be polite and respectful of others. Every year we find ourselves working very close with each other creating the festival. It should go without saying, that a task is made easier through cooperation and respect. Everyone should be treated, as we ourselves would like to be treated. This community is our home; please show courtesy to locals.

**PROPERTY OF OTHERS** Do not touch, pickup, fold, spindle or mutilate things that are not your own. Many of the props, costume items, and tools of our trade are not easy to come by or inexpensive. Meddling with vendor stock and/or stealing will not be tolerated. A person caught stealing will be prosecuted to the fullest extent possible.

**YOUR CHARACTER** During the festival day, remain in character. The fantasy is what it's all about folks! The fact that you can enter a gate and feel like you have been transported back in time to a place, where none of your worries exists, is magical and thrilling.

**COMPLY WITH DRESS CODE** Our costumes must give the people around us the feeling of stepping back in time. If you have questions about what to wear as Renaissance fashion, please call one of the Directors.



**Basic Female Costume** consists of the following:

- \* Chemise (under dress/blouse)
- \* Bodice
- \* Long skirt (women did not normally wear pants during this era)
- \* Hat or head covering
- \* Approved Footwear



**Basic Man's Costume** consists of the following:

- \* Shirt
- \* **Peasant** –vest or jerkin
- \* **Noble** – doublet
- \* Trousers or tights and slops
- \* Hat – By Royal Order
- \* Approved Footwear

**HARASSMENT:** *Potential* harassment, sexual or otherwise, will not be tolerated. If you think **you** might be going too far, **you probably are.** Beside any possible legal action, harassment is most certainly your fastest ticket out of the festival. This applies to everyone, patron and participant alike. If you feel harassed, go to someone in management so we can take action.



**DRUGS AND ALCOHOL** IF you have a prescription for medication, please take it as directed. Be sure to notify our directing staff of any medical condition, such as diabetes, so they can take it into account when dealing with you during any emergency. Everyone is responsible for their own well being, but as a group, we encourage monitoring and checking in on fellow cast members from time to time.

If you have illegal possession of a controlled substance on the festival grounds, we will have no choice but to eject you and contact local law enforcement.

Alcohol should not be consumed by cast members at the festival.

**APPEARANCE** Personal Hygiene is of utmost importance. We expect you to shower daily, use deodorant and present yourself and your character in the manner we have directed you. Those with beards, and mustaches should have them maintained throughout the season. Long hair should be tied back or braided on the festival day. The use of nail polish is not period and therefore not allowed on any nails visible to a patron. Your clothing should be washed weekly and sprayed with Febreze or a mixture of Vodka/Water on a daily basis. Wear and tear is expected during the course of the season, but at no time should costuming be in such disarray as to be indecent to wear. You are expected to wear the approved costume on all festival days. Any changes or variations must be approved in advance. Any costuming issues will be directed promptly to the Costume Director (Patti Amor).

**DIRECTION** As an actor, you are expected to do as told when you are told to do something. During rehearsals we will review character development in order to prepare you for the festival day. We will rehearse how you are to perform, we will review/rehearse shows, assign daily duties such as gate, joust, and parapet. However, there will be times on a festival day when you may be requested to assist in other duties, i.e. working the lines at the ticket booth, assisting with any feasts, helping locate a lost child. When this happens to conflict with another commitment you may be obligated to, you may mention the conflict to the management personnel directing you to do otherwise, but their decision is final. Persons that may give you direction are Jim Paradise (owner), Jimmy Paradise, Betty Spreen, Laurie Scholl, Lori Hughes, Doc Amor, Patti Amor and Cowboy.

**PERSONAL HEALTH** : You are responsible for your own well-being. Do not do anything on a festival day that may jeopardize your health and safety. Get proper rest the night before a festival day. Eat properly to ensure you have the energy to perform throughout the day. Drink plenty of water. If it is hot, drink Gatorade or Sqwenchers(we will have these backstage). Use sunblock. Use some bug spray on exposed areas. Though ticks are uncommon they have been found in some parts of the grounds.

If you are not feeling well, inform your directors. We may be able to modify your duties for the day or we may send you home early. We expect you to be at all performance days but we also do not want you to infect the rest of the cast and patrons by being contagious on a festival day.

If you are on medication, make provisions to take it on a festival day. Inform the directing staff of any needs you may have in that regard.

**2015 PITTSBURGH RENAISSANCE FESTIVAL  
ENTERTAINMENT CONTRACT**

Independent Contractor's Name:

Show Name:

Address/City/State/Zip Code:

Home Phone:

Other Phone:

Email:

Website:

Social Security #/Federal Tax ID#:

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The undersigned independent contractor(s) ("Contractor") and South Huntingdon Land LLC, d/b/a the Pittsburgh Renaissance Festival ("Festival") hereby agree as follows:

**1. PERFORMANCES.** Contractor will, during the period of the Festival subject to acts of God and other events not within the Company's control, perform as an independent contractor at the 2015 Pittsburgh Renaissance Festival during the Festival's hours of performance on the following dates (the "Festival Days"):

August 22-23, August 29-30  
September 5-6-7, 12-13, 19-20, 26-27, 2015

**2. REQUIREMENTS OF CONTRACTOR.** Contractor agrees to:

- Perform four (4) promotional events, or others if requested to do so.
- Perform as scheduled by South Huntingdon Land, LLC.
- Participate in the opening ceremonies, daily processional and closing ceremonies.
- Provide a costume suitable to the Renaissance period and all equipment and materials necessary to perform services.
- Comply with any written rules and policies of the Festival and to obey verbal instructions from Festival staff.
- No replacement or substitutions unless agreed upon by Festival management!

**3. COMPENSATION.** Contractor will receive:                      Total                      X 13 days  
To Be Paid: 1) {                      on or about 9/6/2015 2) {                      or about 9/27/2015

\*Check will not be issued without a social security number or Federal tax ID number.

- One Festival Identification Pass (ID)
- Two complimentary tickets (dates limited)

**4. ADDITIONAL TERMS, AGREEMENTS AND CONDITIONS:**

- a) Court Character throughout the Festival Day as per PRF scheduling.
- b) Hat Pass NOT Included.
- c) Costume Provided by Patti Amor. Actor responsible for footwear, and accessories.
- d) Camping not needed.



**5. WORKMAN'S COMPENSATION COVERAGE:** Contractor will be performing as an independent contractor at the 2015 Pittsburgh Renaissance Festival. Therefore, contractor is NOT eligible for worker's compensation benefits. Signing and notarizing this agreement by contractor acknowledges this agreement and is binding.

**6. CANCELLATION.** If the Pittsburgh Renaissance Festival is partially or wholly canceled or terminated for any reason, Contractor's compensation shall be proportionately reduced to the extent that Contractor's services are not performed. Upon such cancellation, the Festival's sole obligation and liability shall be to pay Contractor's compensation as so reduced.

**7. NON-PERFORMANCE.** If contractor for any reason does not perform any shows or otherwise does not fully perform any show or otherwise does not fully perform Contractor's services under this contract, Contractor's compensation shall be proportionally reduced to the extent Contractors services are not performed.

**8. USE OF NAME/IMAGE PRESENTATION, ETC.** Contractor hereby permanently and without further compensation authorizes the Festival, or anyone authorized by the Festival, to use Contractor's name, image presentation, likeness, voice, and musical or other sound effects produced by Contractor, in any medium and for any purpose whatsoever, including but not limited to promotion, advertising, trade, or commercial utilization of the Pittsburgh Renaissance Festival.

**9. NON-COMPETE CLAUSE.** Contractor agrees not to perform at any performance venue throughout the year, without the permission of the Pittsburgh Renaissance Festival, within a 100-mile radius of the Pittsburgh Renaissance Festival site, which would be in direct competition with the Pittsburgh Renaissance Festival theme.

**10. WAIVER/INDEMNITY.** Contractor assumes all risks associated with the preparation for or participation in the Pittsburgh Renaissance Festival including, but not limited to, the condition of the Festival premises, the actions of other participants or patrons, and the effects of weather. Knowing these risks and in consideration of the Festival entering into this Contract, Contractor, for Contractor and anyone claiming for, through, or under Contractor, waives and releases the Festival, its owners, officers, agents, employees, affiliated companies and all sponsors of the Pittsburgh Renaissance Festival, their representatives and successors (collectively, "Released Persons") from all claims, damages, loses, and expenses of any kind, arising out of the preparation for or participation in the Pittsburgh Renaissance Festival, even though caused by negligence / on the part of a Released Person. Further, Contractor agrees to indemnify and hold harmless the Festival and all other Released Persons from all claims, damages, losses, and expenses (including but not limited to reasonable attorney's fees), of any kind arising out of Contractor's performance or non-performance of the Contract or caused partially or entirely by negligent acts or omissions of Contractor, Contractor's agents or employees, even though caused in part by a Released Person.



**11. INDEPENDENT CONTRACTOR.** Contractor will at all times be an independent contractor rather than an employee or agent of the Festival. As an independent contractor, income taxes and FICA (social security taxes) will not be withheld or paid by Festival for Contractor or any employee of the Contractor, and the Festival will not provide Contractor with unemployment or worker's compensation benefits. Contractor will be responsible for paying all income taxes and self-employment taxes on Contractor's compensation. (If compensation is \$600.00 or more you will receive IRS Form 1099 by January 31, 2016).

**12. TERMINATION.** With reasonable cause, the Pittsburgh Renaissance Festival may terminate this Contract effective immediately upon the giving of written notice of termination. Reasonable cause shall include, but shall not be limited to, any failure of the contractor to perform or comply with (a) the terms of the Contract or (b) any written rules and policies of the Festival as now or hereafter adopted or amended.

**13. INTERPRETATION.** This Contract contains the entire agreement between the parties, supersedes all prior agreements and understandings, and may be modified or amended only in a writing signed by all parties. This Contract shall be binding upon and inure to the benefit of the parties, their respective heirs, representatives, successors and assigns. This Agreement shall not be effective until signed by both parties, as well as notarized by independent contractor.  
Approved and Accepted by:

INDEPENDENT CONTRACTOR

SOUTH HUNTINGDON LAND LLC.

\_\_\_\_\_  
Authorized Signer

\_\_\_\_\_  
Authorized Signer

Date \_\_\_\_\_

Date \_\_\_\_\_

Approved and Accepted by  
**INDEPENDENT CONTRACTOR**

\_\_\_\_\_  
Authorized Signer

\_\_\_\_\_  
Date

Subscribed and Sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 2015

by \_\_\_\_\_ as INDEPENDENT CONTRACTOR.

Witness my hand and official seal.

My commission expires \_\_\_\_\_.

\_\_\_\_\_  
NOTARY PUBLIC

(SEAL)

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**SOUTH HUNTINGDON LAND LLC.**

\_\_\_\_\_  
Authorized Signer

\_\_\_\_\_  
Date

Subscribed and Sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 2015

by \_\_\_\_\_ as PRESIDENT of SOUTH HUNTINGDON LAND LLC.

Witness my hand and official seal.

My commission expires \_\_\_\_\_.

\_\_\_\_\_  
NOTARY PUBLIC

(SEAL)

well i didnt want to bring it up, because i sort of asked quinn already and he didnt really answer me straight and it made me want to know the truth even more, im the type of person that likes attention and likes ppl to like me. when ppl lie, or talk about me behind my back, the german and nordic temperment comes out... and no one wants to see that rachel

i see

but i was told that the reason i was made sally brown was because last year the cast found out that i was a cam girl and apparently half of the mtried to look me up and the other half just made fun of me

as far as that being the reason i really couldn't say if thats the case, as far as the other stuff, the story was that you decided to tell some people, and where to find you online...

that's how i heard it anyway

i did tell a couple ppl but i dont remember who, or telling them my screen name, or how to find me...

but then i was also told that at the pirates only practice, everyone was making sally brown jokes that wereny about sally... but comparing me to sally, saying im good for the part etc

If you tell me promise i wont start fights. i appreciate when ppl are honest with me

i will tell you what i know and at the same time i will tell you what everything i

have ever said bad about you. my comments are easy

Alright. Tell away



